

MELINDA HAAG (CSBN 132612)  
 United States Attorney  
 ALEX G. TSE (CSBN 152348)  
 Chief, Civil Division  
 CLAIRE T. CORMIER (CSBN 154364)  
 Assistant United States Attorney  
 150 Almaden Blvd., Suite 900  
 San Jose, California 95113  
 Telephone: (408) 535-5082  
 FAX: (408) 535-5081  
 claire.cormier@usdoj.gov

Specially appearing for  
 Federal Defendants

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 EUREKA DIVISION

BROOKTRAILS TOWNSHIP	)	No. C12-5576 NJV
COMMUNITY SERVICES DISTRICT, a	)	
public agency,	)	STIPULATION AND <del>[PROPOSED]</del>
	)	ORDER EXTENDING TIME TO
Plaintiff,	)	RESPOND TO COMPLAINT AND
	)	CONTINUING INITIAL CASE
v.	)	MANAGEMENT CONFERENCE
	)	
UNITED STATES DEPARTMENT OF	)	
AGRICULTURE, RURAL	)	
DEVELOPMENT; JOSEPH SHUNK,	)	
	)	
Defendants.	)	

The parties previously stipulated that the defendants would have an extension of time  
 December 31, 2012 to answer, move, or otherwise respond to the Complaint for Injunctive Relief  
 ("Complaint") in this action if certain partial production of documents was done. That  
 production was done, and defendant USDA has committed to a further rolling production with  
 the plan of completing the response and production relating to plaintiff's Freedom of Information  
 Act request by January 18, 2013. The parties are hopeful that this rolling production may lead to  
 the dismissal of this action.

In order to allow for the completion of the production and plaintiff's review of the  
 documents and any claimed exemptions, the parties wish to further extend the deadline for

defendants' response to the Complaint, as well as the initial case management conference, currently scheduled for January 29, 2013.

Accordingly, pursuant to Civil Local Rule 6-1(a), the parties to this action hereby stipulate and request that the defendants shall have an extension of time to January 31, 2013 to answer, move, or otherwise respond to the Complaint.

The parties further stipulate and request that the initial case management conference, currently scheduled to take place on January 29, 2013, be continued to February 26, 2013, and that the related case management dates be continued accordingly.

IT IS SO STIPULATED.

Respectfully submitted,  
DATED: December 17, 2012 NEARY and O'BRIEN  
/s/ Christopher J. Neary

CHRISTOPHER J. NEARY  
Attorney for Plaintiffs

DATED: December 18, 2012 MELINDA HAAG  
United States Attorney  
/s/ Claire T. Cormier

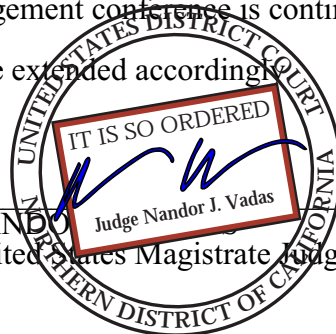
CLAIRE T. CORMIER<sup>1</sup>  
Assistant United States Attorney

**[PROPOSED] ORDER**

Pursuant to the stipulation of the parties and good cause appearing, the deadline for defendants to answer, move, or otherwise respond to the Complaint in this action is extended to January 31, 2013. The initial case management conference is continued to February 26, 2013, and other case management deadlines are extended accordingly.

DATE: December 19, 2012

NANDOR J. VADAS  
United States Magistrate Judge



<sup>1</sup> I, Claire T. Cormier, hereby attest that Mr. Neary authorized me to electronically sign this document on his behalf.